

EXHIBIT 4

Michelle Brown

April 23, 2022

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO,
et al.,

Plaintiffs,

VS.

GREGORY W. ABBOTT, et al.,
Defendants.

Case No. 5:21-cv-844-XR

OCA-GREATER HOUSTON, et al.,
Plaintiffs,

VS.

JOHN SCOTT, et al.,
Defendants.

Case No. 1:21-cv-780-XR

DELTA SIGMA THETA, et al.,
Plaintiffs,

VS.

GREGORY W. ABBOTT, et al.,
Defendants.

Case No. 5:21-cv-848-XR

LULAC TEXAS, et al.,
Plaintiffs,

VS.

JOHN SCOTT, et al.,
Defendants.

Case No. 1:21-cv-0786-XR

MI FAMILIA VOTA, et al.,
Plaintiffs,

VS.

GREGORY ABBOTT, et al.,
Defendants.

Case No. 5:21-cv-0920-XR

ORAL AND VIDEOTAPED 30(b)(6) DEPOSITION OF
DELTA SIGMA THETA SORORITY, INC.,
THROUGH ITS DESIGNATED REPRESENTATIVE,
MICHELLE BROWN
APRIL 23, 2022

DEPOSITION of MICHELLE BROWN, produced
as a witness at the instance of the Defendants, and
duly sworn, was taken in the above-styled and
numbered cause on the 22nd day of April, 2022, from
10:08 a.m. to 4:08 p.m., before Christy R. Sievert,
CSR, RPR, in and for the State of Texas, reported by
machine shorthand, at the offices of Reed Smith,
LLP, 2850 N. Harwood Street, Suite 1500, Dallas,
Texas pursuant to the Mississippi Rules of Civil
Procedure and the provisions stated on the record or
attached hereto.

1 Q. All right. Have your members -- and
2 they're continuing to register, the 200 or so, in
3 Fort Worth?

4 A. Yes.

5 Q. Okay. And they're continuing both of those
6 activities?

7 A. Yes.

8 Q. Okay. All right. Then another thing that
9 it says is -- is voter education programs, that
10 you -- you serve and you work on voter education
11 programs in addition to voter registration. Let's
12 talk about that a little bit. Okay.

13 Tell me what that has typically involved.

14 A. Candidate forums. Candidate forums where
15 we bring together candidates of both parties to talk
16 about the issues for our members. We normally have
17 worked in conjunction with the League of Women
18 Voters, NAACP, to provide those type of candidate
19 forums for local elections.

20 We also provide educational awareness
21 programs for the community and our members on how to
22 vote, where to vote, and discussing the ballot, what
23 it looks like and how to -- how to vote and making
24 sure that they are aware and educated on the issues
25 that are at hand for each local election, and

1 national election for that matter.

2 Q. Okay. That's helpful.

3 Candidate forums. Then so what level of
4 forums? Are we talking about statewide elections?
5 Are we talking about regional?

6 A. Local elections for the most part, yes.

7 Q. So tell me in -- in March, we had a big
8 primary. Were there -- did you do candidate forums
9 in -- for the March election?

10 A. Yes.

11 Q. Okay. What ones do you recall?

12 A. Definitely recall my chapter did the -- did
13 a forum for the mayor's race.

14 Q. Is that mayor of Fort Worth?

15 A. Yes.

16 Q. Okay.

17 A. And I'm sure that other chapters did the
18 same for whatever local elections. That's just a
19 staple part of what we do.

20 Q. Okay. And you -- you've done that in prior
21 elections, these --

22 A. Yes.

23 Q. -- local candidate forums. And you've
24 continued to do it and --

25 A. Yes, we have.

1 Q. Okay. And it's the case that you did that
2 for the March election?

3 A. Yes.

4 Q. Okay. All of that?

5 A. Yes.

6 Q. So from phone banks, that was still in
7 March.

8 A. Uh-huh.

9 Q. The brochures were done in March?

10 A. Yes.

11 Q. Okay.

12 A. Also March, we were in the middle of Covid,
13 right? Weren't we in Covid in --

14 Q. Some still were, yeah.

15 A. Which is a pre- -- okay. Yeah.

16 Q. So I'm talking about March of 2022, yeah.
17 Just last month, yeah.

18 A. Okay. So we did a lot of events via Zoom.

19 Q. Okay. You did the events because of Covid.

20 A. I'm sorry, I said pre. Yeah, because of
21 Covid. The majority of our activities ended up
22 because of Covid via Zoom. Forums were via Zoom.
23 Educational seminars were via Zoom.

24 Q. Okay. And was that the case -- I mean, I'm
25 thinking back. November of 2020, we were in the

1 midst of Covid. Were y'all also during that time
2 doing these activities more remotely?

3 A. Yeah, more remotely. Especially after the
4 first of the year, definitely we went more -- more
5 virtual.

6 Q. Okay. All right. So -- and that was the
7 same, then, for March of 2022?

8 A. Right.

9 Q. Okay. So as far as the -- what we have
10 gone through right now, the voter registration
11 efforts and the voting education efforts that we've
12 discussed, those -- those have gone a pace, the same
13 in '22 as 2020?

14 A. Let me say because of Covid, now, the voter
15 registration -- and I do apologize because I -- I
16 thought you meant pre-pre any of SB1 information
17 coming out. But preCovid, we were definitely out in
18 the community constantly. So voter registration was
19 high. We continued what voter registration efforts
20 we could after Covid until we went totally virtual
21 at some point, yeah.

22 Q. Okay. Got it. So what -- in other words,
23 when you were in Covid in '20, so that would have
24 just been the November election, and what the --
25 activities that occurred in November of '20 are the

1 information into the chat, your name, firm and
2 e-mail, that would be helpful for the reporter and
3 I.

4 If there is nothing else for the record,
5 we are off the record at 4:08 p.m.

6 (Deposition concluded at 4:08 p.m.)
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